

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11,  
2001

03 MDL 1570 (GBD) (FM)  
ECF Case

This document relates to:

*Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al.*, 04-CV-1076 (GBD)

**The O'Neill Plaintiffs' Motion for Entry of Default Judgment as to Liability Against  
Iran Defendants Pursuant to 28 U.S.C. § 1605A**

PLEASE TAKE NOTICE that upon the affidavit of Jerry S. Goldman, Esq., and the exhibits attached thereto, the O'Neill Plaintiffs, by and through their counsel, Anderson Kill, P.C., will move the Court before the Honorable George B. Daniels, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an Order granting the O'Neill Plaintiffs' motion for entry of default judgment as to liability against the Islamic Republic of Iran, the Iranian Ministry of Intelligence and Security, the Iranian Minister of Intelligence and Security Ali Fallahian, the Iranian Revolutionary Guard Corps, the Iranian Revolutionary Guard Corps – Qods Force, Ayatollah Ali Hoseini-Khamenei, and Deputy Commander Brigadier General of the Iranian Revolutionary Guard Corp. Mohammed Baqr Zalqadr, pursuant to 28 U.S.C. § 1605A.

Dated: August 11, 2015  
New York, NY New York

/s/ Jerry S. Goldman  
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